

31. (NEW) The system of claim 28, wherein the output means includes a speaker.

32. (NEW) The system of claim 29, wherein the prompt to use each of the plurality of aspects in a sentence describing the picture is a speech prompt.

33. (NEW) The system of claim 29, wherein the system is implemented in a computer and the display is a computer monitor.

#### **REMARKS**

This Preliminary Amendment is filed with the accompanying RCE in response to the Office Action dated February 26, 2001. Claims 1-20 are currently in the instant application, with new claims 21-33 being added herein. Claims 1-8 and 10-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,562,453 (Wen) in view of U.S. Patent No. 5,357,596 (Takebayashi et al.) ("Takebayashi"). Claim 9 is rejected under 35 U.S.C. § 103(a) as being unpatentable Wen in view of Takebayashi, and further in view of U.S. Patent No. 5,487,671 (Shapiro et al.) ("Shapiro").

Applicant has amended independent claims 1 and 12, and dependent claims 4,6,7,8,11, 15, and 17-19 herein. More particularly, Applicant has amended such claims to show that a picture displayed to a user of the system may be comprised of various aspects; e.g., several nouns, nouns and verbs, etc. In the example shown in the instant application, the aspects may include "sailor," "box," and "hitting". The user is prompted for a description or user-identification of each of these aspects, after which the system applies speech recognition processing and natural language understanding processing to each such description/identification. Preferably, upon successful speech recognition and natural language understanding processing of each such aspect description, the system prompts the user to use each in a sentence describing the picture. Additionally, the user is preferably allowed a predetermined number of tries to use the aspects in a sentence to describe the picture. If, after the predetermined number of times, at least one of the aspects is incorrectly identified, the system

may prompt the user with the incorrectly identified aspects. The system may also prompt the user with the correctly identified aspects.

Newly added claims 21-33 are also directed to the novel features discussed above. Support for the above amendments and the new claims may be found throughout the application; for example, at page 6, lines 12-31, page 7, lines 1-4 and Figure 3.

The Examiner cites Wen for teaching the following elements: "*visual display device...*," "*speaker...*," "*processor...*," "*displaying a picture*," "*generating a speech prompt*," and "*inputting a speech response*." The Examiner further acknowledges that Wen does not specifically teach "*performing speech recognition*" and "*performing natural language analysis...analyzing content...recognized words as synonyms...accepting synonyms...*," However, he claims that Takebayashi teaches "*a speech dialogue system for improving human-computer interaction which the system performs semantic understanding of a user's spoken words...*" (Office Action dated February 26, 2001, p. 3, para. 4). Further, the Examiner continues that:

*"[I]t would have been obvious to modify the biofeedback training system of Wen to implement a speech understanding and dialogue management system as taught by Takebayashi et al. because **such modification would improve the system evaluation of the user which improve the performance of the training tutor**" [Emphasis added][Id.]*

Applicant submits that this is not a correct application of a finding of obviousness under 35 U.S.C. § 103(a). More particularly, the mere fact that the invention of one patent would improve the invention of another does not imply that there is in fact a teaching to combine the references.

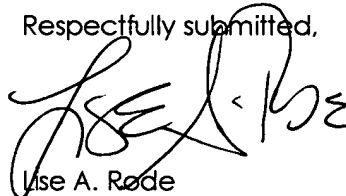
However, in view of Applicant's amendments herein, the rejection of claims 1-20 is believed to be moot. Neither the Wen nor Takebayashi reference, alone or in combination, teach or suggest Applicant's claimed invention wherein a user is prompted for a description or user-identification of each of the aspects of a picture, applies speech recognition processing and natural language understanding processing to each such description/identification, and then, upon successful processing of each such aspect description, prompts the user to complete a sentence describing the picture using each of the thus-

of a picture, applies speech recognition processing and natural language understanding processing to each such description/identification, and then, upon successful processing of each such aspect description, prompts the user to complete a sentence describing the picture using each of the thus-processed/accepted aspects. Additionally, neither reference teaches or suggests that the user is preferably allowed a predetermined number of tries to use the aspects in a sentence to describe the picture, and if, after the predetermined number of times, at least one of the aspects is incorrectly identified, that the system may prompt the user with the incorrectly-identified aspects and may also prompt the user with the correctly-identified aspects.

In view of the above amendments and remarks herein, Applicant believes that claims 1-33 are allowable over the prior art of record, and that the application should pass to issuance. Applicants therefore respectfully request reconsideration of the present application, as amended herein. Should the Examiner be of the opinion that a telephone or other interview would expedite the processing of this application, he is invited to contact the undersigned at (215) 986-5169. Should the Examiner have any other questions he is also invited to contact the undersigned at the same number.

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March 30, 2001

